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**Via Email**

May 21, 2024

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RE: *Hunt v. Southern Baptist Convention et al.*, 3:23-cv-243 (M.D. Tenn.)

Dear Counsel:

We write regarding the Court's recent Order on the production of text messages (Doc. No. 197) and Guidepost's compliance with the Order.

Last week, the Court ordered Guidepost to search the phones of Ms. Myers Wood, Ms. Tongring, Ms. Kilpatrick, and Mr. Holske and supplement its production by May 28, 2024. On March 15, 2024, we requested that you provide us with the details of your anticipated collection efforts to ensure that compliance is delivered without controversy. We have not received any response from Guidepost.

While the Court did not order a forensic collection at this time because Plaintiff "has not provided evidence of document destruction or loss" (Doc. No. 197 at 5), such evidence may be forthcoming. We are aware of a multitude of text messages covered by the Court's Order that have not been produced by Guidepost suggesting the necessary "destruction or loss" for a full forensic collection. A few examples include, but are not limited to: [Doe]\_0000049, [Doe]\_0000052, [Doe]\_0000264, and [Doe]\_0000265.

To avoid unnecessary motion practice and delay, we hope to discuss the details of Guidepost's collection efforts in advance of its supplemental production. Please provide a description of the steps Guidepost will take to comply with the Court's Order and ensure all missing text messages will be produced by May 23, 2024.

Best regards.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. MacGill", with a long horizontal stroke extending to the left.

Robert D. MacGill